

MEMO ENDORSED



MICHAEL A. CARDOZO
Corporation Counsel

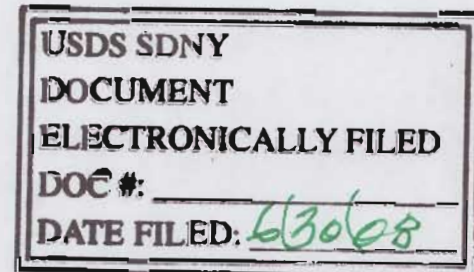
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June 23, 2008

By Facsimile

Honorable Naomi Reice Buchwald
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007



Re: Kingsley v. NYPD, et al.
07 CV 7629 (NRB)

Dear Judge Buchwald:

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, assigned to represent the defendants the New York City Police Department ("NYPD"), the City of New York, Police Commissioner Raymond Kelly, and Deputy Inspector Vincent Guerriera (collectively "defendants") in the above-referenced action.

This letter is submitted in order to request an extension of time to complete discovery in this matter. Discovery is currently scheduled to close on July 1, 2008. To date, despite efforts to contact plaintiff *pro se* to arrange for a mutually convenient date to schedule her deposition in this matter, I have been unable to reach her by telephone, and consequently no deposition has yet been scheduled. Further, defendants were served with plaintiff's first set of document requests on June 2, 2008, less than 30 days prior to the original close-of-discovery date. Despite this untimely service, defendants are preparing responses to plaintiff's requests. However, in light of the time required to retrieve certain documents from the NYPD's archives, defendants do not anticipate being able to provide responses prior to July 1, 2008. Moreover, plaintiff served additional document requests on defendants last week on June 18, 2008. Defendants have reviewed the requests and are beginning to search for responsive materials, however, the process of locating responsive documents is expected to take at least 30 days, if not longer. Accordingly, defendants request a 60-day extension of the end-of-discovery deadline

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from July 1, 2008, to September 2, 2008. This is defendants' first request for an extension of the discovery deadline.

I have left plaintiff a message explaining my intention to make this request, but to date, have not spoken with her to obtain her consent to his request.

Thank you for your consideration of this request.

Respectfully submitted,

Joshua Fay
Joshua Fay

Assistant Corporation Counsel

cc: Sonja Kingsley
Plaintiff *pro se*
(By Overnight Mail)

Application
granted.
No further
extension

So Ordered.

Naomi Reice Buchwald
NRB

6/24/08